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*State Farm Mutual Automobile Insurance Company*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 WILLIAM O. HENDERSON; ROBERT E.  
13 WRIGHT; and JAMILLA SAYLES,

14 Plaintiff,

15  
16 vs.

17 STATE FARM MUTUAL AUTOMOBILE  
18 INSURANCE COMPANY; DOES 1 through X; and  
ROE CORPORATIONS XI through XX,

19 Defendants.

**CASE NO.: 2:20-cv-00252-JCM-EJY**

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
STATE FARM TO FILE ITS  
OPPOSITION TO PLAINTIFFS'  
MOTION TO REMAND TO STATE  
COURT (Doc. 5).**

**(First Request)**

20 Pursuant to LR IA 6-2, Defendant, State Farm Mutual Automobile Insurance Company,  
21 through its attorney, Hall Jaffe & Clayton, LLP, and Plaintiffs, William O. Henderson, Robert E.  
22 Wright, and Jamilla Sayles, through their attorney, Eglet Adams, hereby submit this Stipulation  
23 and Order to Extend Time for Defendant State Farm to File Its Opposition to Plaintiffs' Motion  
24 for Remand to State Court (Doc. 5), which was filed on February 24, 2020.

25 The basis for this request stems from State Farm's need to review and select the key  
26 documents from the claims file to support its forthcoming opposition to the motion for remand.  
27 More specifically, in responding to the pending motion for remand, State Farm is obligated to  
28 provide "summary judgment" type of evidence to establish whether the potential amount in

controversy exceeds the \$75,000. To accomplish this task, State Farm needs sufficient time to review the claims file, which involves reviewing the injury claims of three separate individuals, and which contains over 4000 pages, to select those medical records, demand letters, and other documents that support an amount in controversy in excess of \$75,000. Thus, additional time, i.e., one additional week, is necessary for State Farm's counsel to accomplish this task. This request is not made for purposes of delaying these proceedings but is made in good faith given the unique factors of this case discussed above. With the one-week extension, **State Farm's Opposition would be due on Thursday, March 16, 2020.** This is State Farm's first request for an extension of the deadlines to file its Opposition to the Plaintiffs' Motion to Remand to State Court, and the first stipulation submitted by the parties.

Dated this \_\_\_\_ day of March, 2020.

Dated this \_\_\_\_ day of March, 2020

HALL JAFFE & CLAYTON, LLP

EGLET ADAMS

*/s/ Riley A. Clayton*

*/s/ Ashley Kabins*

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## ORDER

### IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

Dated: March 9, 2020